

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	CASE NO. 2:19-CR-202
v.	:	JUDGE WATSON
THOMAS J. ROMANO,	:	
Defendant.	:	

MOTION TO ENFORCE SUBPOENAS

Defendant Thomas J. Romano, through undersigned counsel, respectfully moves the Court for an Order declaring that all subpoenas previously issued on Defendant's behalf remain in effect for the August 1, 2022, jury trial in the above-referenced matter. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted,

/s/ Samuel H. Shamansky
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Counsel for Defendant

MEMORANDUM

The jury trial previously scheduled to commence on March 14, 2022, was continued to August 1, 2022. (Doc. 58). Numerous subpoenas were filed and served on prospective defense witnesses to testify at trial. Defendant respectfully requests an Order stating that all prior defense subpoenas shall remain in effect for the jury trial scheduled to begin on August 1, 2022. This would avoid the expense and burden of having to refile revised subpoenas and hiring a process server to effectuate service. The undersigned counsel will notify all defense witnesses who were previously served of the rescheduled jury trial date.

Accordingly, based on the foregoing, Defendant respectfully moves the Court for Order stating that Defendant's subpoenas previously served for the March 14, 2022, jury trial date shall remain in effect for the jury trial scheduled to begin on August 1, 2022.

Respectfully submitted,

/s/ Samuel H. Shamansky
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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Assistant U.S. Attorney Christopher Jason, 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215 on April 12, 2022.

/s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY